



State of Kansas

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Secretary
Federal Trade Commission
600 Pennsylvania Avenue, N.W.
Room H-159
Washington, D.C. 20580



RE: Comments on 16 CFR Part 453

Dear Friends:

I recently became aware the Federal Trade Commission is soliciting comments on proposed changes to the Funeral Rule [16 CFR Part 453]. Thank you for allowing me the opportunity to submit comments on this consumer protection issue.

The disclosures currently required by the Funeral Rule are important in protecting consumers when purchasing funeral merchandise and/or services in times of need and these should be continued. In addition, the Rule should be expanded to include new businesses in this industry. As I am sure the Commission is aware, the Internet is an ever-expanding medium and consumers may now purchase funeral merchandise through this venue, as well as from retail stores in their local communities. However, with the current definition of "funeral provider," these entities are not required to provide the same disclosures as traditional funeral providers. By changing an "and" to an "or" in the definition of funeral provider, all entities selling these types of products and/or services would be required to give proper disclosures to the consumer.

In order to provide uniform protection to all consumers when purchasing funeral merchandise, and to level the playing field for all funeral merchandise providers, I would respectfully request the Commission broaden the Funeral Rule to include suppliers who sell funeral merchandise via the Internet or a retail location [separate from a funeral home].

Very truly yours,

Carla J. Stovall
Carla J. Stovall
Attorney General

CJS:GEB